



**State of New Jersey**  
**OFFICE OF EMERGENCY TELECOMMUNICATIONS SERVICES**

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S. Robert Miller  
Director

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SEP 25 1996  
FCC 418-0200

September 24, 1996

FCC Secretary  
1919 M Street N.W.  
Washington, DC 20554  
(202) 418-0200

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Dear Sir,

Please find enclosed an original and five copies of comments in response to the Commission's Further Notice of Proposed Rulemaking on Docket 94-102.

Sincerely,

*S. Robert Miller*  
S. Robert Miller  
Executive Director

encls.

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Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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SEP 25 1996

FCC FILE NO.

In the Matter of )  
 ) CC Docket No. 94-102  
Revision of the Commission's Rules )  
to Ensure Compatibility with )  
Enhanced 911 Emergency Calling Systems )

To: The Commission

COMMENTS OF NEW JERSEY OETS

The Office of Emergency Telecommunications Services (OETS), hereby submits the following comments in response to the Commission's Further Notice of Proposed Rulemaking in the above-captioned proceeding.

The Commission is to be commended for their goal in this proceeding *"to make wireless services as comparable as possible to wireline service in E 9-1-1 access."* The lack of Selective Routing (SR), Automatic Location Identification (ALI), Automatic Number Identification (ANI), and other enhanced 9-1-1 features continues to cause major problems for the Public Safety Answering Points (PSAPs) throughout New Jersey. Additionally, wireless 9-1-1 lacks even basic 9-1-1 features such as Call Party Hold, Ringback, and the ability to perform a Call-Trace to identify a caller's location.

The lack of wireline 9-1-1 features increases total call time which in turn leads to increased answering time, a degradation of the P.01 grade of service for our 9-1-1 network, and

an increase in response time which can often be the difference between a life saved and a life lost. This is also causing a drain on our facilities and staffing and is increasing the overall operating costs of PSAPs throughout New Jersey. Fraudulent and prank calls, which were all but eliminated with wireline enhanced 9-1-1, have resurfaced. A Police Officer was killed in North Jersey responding to such a call. In South Jersey, close to a hundred prank 9-1-1 calls were made from a single cellular phone in a 72-hour period. New Jersey supports the position taken by NENA and NASNA that non-initialized wireless phones (hot out-of-the-box) not be programmed to allow access to 9-1-1.

We do not agree with the Commission that a wireless phone can be compared with a coin phone. If a pay-phone company installs a telephone and the line is not activated by the local exchange carrier or is disconnected for lack of payment, the phone is not operative. Likewise, a phone purchased by a consumer will not automatically work if the purchaser finds an RJ11 jack and simply plugs in the phone. In both cases, the consumer will only be able to place a call on a properly registered and initialized (wireline) phone circuit. We also do not agree that this issue should be left up to local PSAP authorities. We must strive for a national standard for the Universal Emergency Reporting Number.

OETS supports the Commission proposal, that at some specific date after the five-year implementation date of Phase II, wireless providers must offer enhanced two dimension location information and the introduction of three-dimension vertical information as the technology matures.

The Commission should revisit the funding issue of Phase II. In concert with a cellular provider, a time-distance-of-arrival (TDOA) location equipment manufacturer, a local telephone exchange provider, and several other vendors, OETS is coordinating a Phase II Wireless E 9-1-1 demonstration. The demonstration will last for approximately 90 days and include four County PSAPs in Southern New Jersey. Based on preliminary information from Alpha tests, OETS feels confident that the demonstration will meet Phase II goals. However, we are less confident that we can find a satisfactory funding mechanism to keep the system up once demonstrated and proven. As with the Federal Government, the State of New Jersey must treat all wireless providers the same. If we participate with the funding of any one wireless provider, we must be financially prepared to participate with the funding of all wireless providers at the same level. Based on preliminary information, we estimate that we will need approximately 200 location sites statewide for each of 10 wireless telephone providers. This is a total of 2000 sites at a reported average cost of \$50,000 each for a New Jersey total of \$100,000,000. By comparison, this is more than New Jersey paid for its entire statewide enhanced wireline 9-1-1 service including start-up cost and fifteen years of prepaid service.

KSI has reported that its simplest location systems using Angle of Arrival (AOA) measurements will cost approximately \$30,000 per site. If the same formula were used, the cost of a New Jersey wireless location system would be \$60,000,000. At these numbers, it will be a challenge to develop an adequate funding source. These costs could be significantly reduced if all the wireless providers would share in the building of such a system. Additionally, the location systems could also be used for Automatic Vehicle Location (AVL) for trunked

communications systems, traffic probes for intelligent vehicle highway systems (IVHS) now known as intelligent transportation systems (ITS), and other telephone related services. As an alternative, the Commission may want to consider that location capability be built in the cell sites of the future as a standard offering. The Commission should consider as a minimum, appropriate action which will encourage the wireless providers to provide such systems in the most economical manner. It is too important for the Commission to simply mandate that Phase II go into effect only if *"a mechanism for the recovery of costs relating to the provision of such services is in place."* If the Commission fails to take a more pro-active position on Phase II, New Jersey doubts that Phase II will be implemented within the five year time frame as mandated by the Commission.

We agree with the Commission that consumer education is a must. Wireless providers must be required to educate their users as to the lack of wireline enhanced features and the proper use of the wireless telephones in reporting emergencies. This educational initiative must be in concert with local public safety entities. This should not be done in a vacuum by the wireless providers. There is a huge gap between the public expectation of 9-1-1 service and the actual level of service available from wireless 9-1-1. A public education and awareness program could help fill this gap.

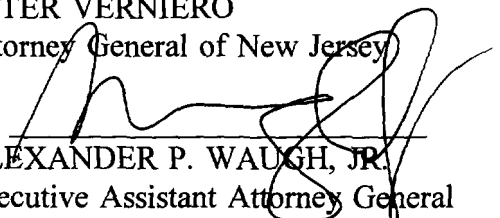
We support the Commission's mandate that a reporting mechanism be established. This will provide the Commission with knowledge as to progress of the goals and the problems encountered in meeting the mandates of this Report and Order. However, we reiterate our earlier

comments that the Commission should establish, under the direction of the Commission, an Industry E 9-1-1 Advisory Committee to devise a consensual solution that will provide a uniform platform for both wireless and wireline 9-1-1. This committee should be made up of an equal number of industry representatives and 9-1-1 public safety representatives. Existing industry standards committees are primarily made up of telephone and wireless industry representatives which quite often see the issues in a different light than public safety representatives.

In conclusion, we commend the Commission for the steps they have taken in this proceeding and urge the Commission to continue to move forward in its adoption of more specific rules to narrow the gap between wireline and wireless 9-1-1 services.

Respectfully submitted,

PETER VERNIERO  
Attorney General of New Jersey

By   
ALEXANDER P. WAUGH, JR.  
Executive Assistant Attorney General  
Chairman, NJ 9-1-1 Commission  
NJ Department of Law and Public Safety

September 24, 1996

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